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*Bankruptcy Counsel to Lead Plaintiffs*

**IN THE UNITED STATES BANKRUPTCY  
THE SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS, INC., *et*  
*al.*,

Debtors.

Chapter 11

Case No. 08-13555 (JMP)  
Jointly Administered

**NOTICE OF WITHDRAWAL OF SECURITIES LITIGATION LEAD  
PLAINTIFFS' LIMITED OBJECTION TO DEBTORS' DISCLOSURE  
STATEMENT FOR THIRD AMENDED JOINT CHAPTER 11 PLAN OF  
LEHMAN BROTHERS HOLDINGS INC.  
AND ITS AFFILIATED DEBTORS**

Alameda County Employees' Retirement Association, Government of Guam Retirement Fund, Northern Ireland Local Government Officers' Superannuation Committee, City of Edinburgh Council as Administering Authority of the Lothian Pension Fund and Operating Engineers Local 3 Trust Fund, the court-appointed lead plaintiffs (collectively, the "Lead Plaintiffs") in the consolidated securities class action pending in the United States District Court for the Southern District of New York (the "District Court") entitled *In re Lehman Brothers*

*Equity/Debt Securities Litigation*, Case No. 08-05523 (LAK) (the “Securities Litigation”)<sup>1</sup>, by and through their undersigned counsel, previously filed a limited objection (the “Limited Objection”)<sup>2</sup> to confirmation of the Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings, Inc. and its Affiliated Debtors. Based upon certain changes set forth in the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings, Inc. and its Affiliated Debtors attached to the Debtors’ Response to Objections to Confirmation, as well as language contained in the proposed Confirmation Order, Lead Plaintiffs hereby withdraw their Limited Objection.

Dated: December 5, 2011  
New York, New York

Respectfully submitted,

**LOWENSTEIN SANDLER PC**

By: /s/ Michael S. Etkin  
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**BERNSTEIN LITOWITZ BERGER &  
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<sup>1</sup> By order of the Judicial Panel on Multidistrict Litigation, the Securities Litigation has been consolidated with a number of other federal actions against Lehman Brothers Holdings, Inc. and other defendants under the caption *In re Lehman Brothers Securities and ERISA Litigation*, Master Case No. 09-MD-2017 (LAK).

<sup>2</sup> Capitalized terms used herein and not otherwise defined shall have the meaning ascribed in the Limited Objection.

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